



# Annual Action Plan

## **Parsippany-Troy Hills, NJ FY 2016**

March 25, 2016

### **PUBLIC DISPLAY VERSION**

**Prepared by:**

The Township of Parsippany-Troy Hills  
Purchasing/ Community Development Block Grant Office

and Mullin & Lonergan Associates, Inc.

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# Executive Summary

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## *AP-05 Executive Summary - 91.200(c), 91.220(b)*

### **1. Introduction**

The Township of Parsippany-Troy Hills receives funding annually from the U.S. Department of Housing and Urban Development under the Community Development Block Grant (CDBG) programs. It is also a participant in the HOME Consortium led by Morris County, and receives Emergency Solutions Grant (ESG) funds through the County.

### **2. Summarize the objectives and outcomes identified in the Plan**

For FY 2015-2019, the Township has identified the following goals and outcomes:

- Continue to address obstacles with respect to meeting underserved needs and to foster affordable housing
- Continue to participate in the HOME Program administered by the County of Morris
- Continue to provide coordination through the Human Services Department with both public and private housing along with various social service agencies
- Preserve existing housing stock through rehabilitation programs
- Continue to evaluate and eliminate lead-based paint, if found, in any assisted housing units
- Continue to work with Morris County and the Housing and Human Services departments to further fair housing
- Continue to work with FHEO staff to obtain additional technical assistance to further administer the Section 3 Program
- Investigate grant opportunities to address the obstacles of inadequate federal dollars available through HUD programs

### **3. Evaluation of past performance**

### **4. Summary of Citizen Participation Process and consultation process**

The Township's Annual Plan results from a process of consultation between key Township personnel including the Mayor and various Department/Division heads (Department of Human Services, Office on Aging, Township Engineer, etc.), as well as residents and various groups (Historical Society, senior groups, disabled groups, the public library, etc.) located within the Township. In addition, the Township reaches out to neighboring municipalities, counties, organizations and entities such as MCRP in preparing the Consolidated Plan.

The Township Council has adopted a Citizen Participation Plan which outlines the procedures for public participation during the planning process for use of Community Development Block Grant funds. The

Township holds at a minimum two public hearings regarding the CDBG program. In addition, the Township sends out mailings to all residents which contain information about the program and accomplishments. The Township also posts various information on the Township web page, at various Township facilities, and in local newspapers.

Residents that inquire about the program are given information and encouraged to meet with staff at any time to discuss potential future programs and/or projects. Any comments that are received are noted for the record and taken into consideration.

**5. Summary of public comments**

The comments will be added upon completion of the Public Review process.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

The comments will be added upon completion of the Public Review process.

**7. Summary**

In summary, the Annual Action Plan has been developed with community input and reflects the decisions and history of the Township Council in funding allocations.

# The Process

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## ***PR-05 Lead & Responsible Agencies - 91.200(b)***

### **1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	PARSIPPANY-TROYHILLS TOWNSHIP	
CDBG Administrator	PARSIPPANY-TROYHILLS TOWNSHIP	

**Table 1 – Responsible Agencies**

### **Narrative**

The Township of Parsippany-Troy Hills is a CDBG entitlement community as well as a participant in Morris County’s HOME Consortium, led by the Morris County Department of Human Services.

### **Consolidated Plan Public Contact Information**

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Parsippany-Troy Hills, NJ 07054

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## ***AP-10 Consultation - 91.100, 91.200(b), 91.215(I)***

### **1. Introduction**

The Township's Annual Plan resulted from a process of consultation between key Township personnel including the Mayor and various Department/Division heads (Business Administrator, Township Engineer, etc.), as well as residents and various groups (Historical Society, senior groups, disabled groups, the public library, etc.) located within the Township. In addition, the Township reached out to neighboring municipalities, counties, organizations, and entities such as MCARP.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

The Township receives a very small allocation of CDBG funds which has been allocated to the housing rehabilitation program. We coordinate with local organizations to reach out to groups with individuals who might be eligible and in need of housing rehabilitation.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Morris County Department of Human Services had been the lead agency for the Continuum of Care since its inception. Within the past two years, the COC created a new organizational entity, the Morris County Continuum of Care (CoC). Representatives of the County's Human Services Department continue to provide staff support for this effort. The Human Services Advisory Committee (HSAC) continues to play a large role in directing county resources to address the needs of homeless persons and persons at risk of homelessness. The HSAC makes funding recommendations on the use of ESG funds to the Board of Chosen Freeholders and vets those recommendations with the COC.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The Township does not receive ESG funding. The Morris County Department of Human Services consults with the CEAS Board to develop the funding plan for the use of ESG funds in the County as well as the development of the performance standards, outcome measures, and policies and procedures. Before anything is finalized, the matter is brought to the COC for review and approval.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

1	<b>Agency/Group/Organization</b>	Friendship Senior Club
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.
2	<b>Agency/Group/Organization</b>	Lake Hiawatha Seniors
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.
3	<b>Agency/Group/Organization</b>	Senior Citizens Club of Parsippany
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.
4	<b>Agency/Group/Organization</b>	Golden Age Club of St. Peter's
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.
5	<b>Agency/Group/Organization</b>	St. Ann's Social Seniors
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.
6	<b>Agency/Group/Organization</b>	St. Christopher's Social Seniors
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.
7	<b>Agency/Group/Organization</b>	Baldwin Oaks Senior Social Club
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.
8	<b>Agency/Group/Organization</b>	Brookside Apartments Senior Club
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis

<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>This organization was consulted through direct mail. Consultation will result in an improved understanding of the community developments needs throughout the township.</p>
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**Table 2 – Agencies, groups, organizations who participated**

**Identify any Agency Types not consulted and provide rationale for not consulting**

There were no types of agencies that the Township did not consult, either through public meetings or personal interviews.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2015-2019 Morris County Consolidated Plan	Morris County	Goals of the Strategic Plan relate to five-year efforts, adjusting based on previous outcomes to maximize benefit of CDBG, HOME, and ESG investments
State of the County, 2014	Morris County Planning Board	Strategic Plan goals rely directly upon the data compiled by the County
Analysis of Impediments to Fair Housing Choice, 2016	Division of Community Development	Strategic Plan goals and objectives will intentionally, affirmatively further fair housing
Morris County Ten-Year Plan to End Homelessness, 2014	Morris County Continuum of Care	The goals of the COC were used in the development of the Strategic plan
ALICE, 2014	United Way of Northern New Jersey	Data and trends from this report influenced the Strategic Plan’s funding allocations
Comprehensive Health Plan 2012-2014	Newark EMA HIV Health Services Planning Council	Strategies for serving individuals with HIV/AIDS identified in this plan are aligned with the Strategic Plan
Local Area Plan, 2013	MSW Workforce Investment Board	Strategic Plan acknowledges and addresses needs identified for expanding economic opportunities

**Table 3 - Other local / regional / federal planning efforts**

***AP-12 Participation - 91.401, 91.105, 91.200(c)***

**1. Summary of citizen participation process/Efforts made to broaden citizen participation**

**Summarize citizen participation process and how it impacted goal-setting**

The Township Council has adopted a Citizen Participation Plan which outlines the procedures for public participation during the planning process for use of Community Development Block Grant funds. The Township holds at a minimum two public hearings regarding the program. During the preparation of the Annual Plan, all municipalities adjacent to the township were notified via letter about plan's comment period and the date for the second public hearing.

In addition, the Township sends out mailings to all residents which contain information about our program and accomplishments. Residents that inquire about the program are given information and encouraged to meet with our staff at any time to discuss potential future programs and/or projects. Any comments that are received are noted for the record and taken into consideration.

The Township also posts various information on the Township web page, at various Township facilities, and in local newspapers.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Ads were purchased announcing the availability of funding and the public hearing dates	N/A	N/A	
2	Public Hearing	Non-targeted/broad community		Please see attached appendix	All comments were accepted	
3	Direct Mailing	Nearby Jurisdictions	Letters were mailed directly to all municipalities adjacent to Parsippany-Troy Hills	N/A	N/A	

**Table 4 – Citizen Participation Outreach**

# Expected Resources

## AP-15 Expected Resources – 91.420(b), 91.220(c) (1, 2)

### Introduction

The total of 2015 CDBG funding for the Township of Parsippany-Troy Hills is \$216,560 with anticipated program income of \$10,000. Four activities were determined to meet overall Township needs and local and national objectives. Of the total available for 2015 activities (exclusive of program administration), 100% will be used for activities that benefit low/moderate income persons.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$193,838	\$3,000		\$196,838	\$581,514	Funds for Housing, services, public improvements

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The Township accesses HOME and Emergency Shelter Grant funds through Morris County. The Section 8 Program is administered directly by the Morris County Housing Authority. The McKinney-Vento Homeless Assistance Program is administered through the Morris County Office of Temporary Assistance. Other resources that have been available to meet and complement the Township's needs include Township funds, State Historic Preservation Funds, Local State Aid, New Jersey Environmental Infrastructure Trust, State Open Space Grant, State Clean Communities Grant, Morris County Historic Preservation Grant, Morris County Open Space Grant, Green Acres Funding, Energy Efficiency & Conservation Block Grant Program, and private donations.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The Township is not involved with land banking and has a limited amount of resources available to acquire, assemble, and dispose of sites for the purpose of expanding affordable housing and employment opportunities.

# Annual Goals and Objectives

## *AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)*

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve/expand public facilities	2015	2019	Non-Housing Community Development	Township-wide	Public Facilities	CDBG: \$63,383	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: Persons Assisted
2	Improve/expand infrastructure	2015	2019	Non-Housing Community Development	Township-wide	Infrastructure	CDBG: \$110,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: Persons Assisted
3	Create/preserve affordable housing	2015	2016	Affordable Housing	Township-wide	Affordable Housing	CDBG: \$3,000	Homeowner Housing Rehabilitated: 2 Housing Units
4	Administration	2015	2019	Administration	Township-wide	Planning & Administration	CDBG: \$20,000	Other: 1 Other

**Table 6 - Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Improve/expand public facilities
	<b>Goal Description</b>	Public facilities serving low income residents including parks, libraries, and social service agencies require capital improvements.
2	<b>Goal Name</b>	Improve/expand infrastructure
	<b>Goal Description</b>	Infrastructure in the low income areas of the township must be improved or expanded to improve the quality of life for lower income residents.
3	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	Program oversight, public outreach, and on-going management of the federal grants programs
4	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	Program oversight, public outreach, and on-going management of the federal grants programs

**Table 7 – Goal Descriptions**

## ***AP-35 Projects - 91.420, 91.220(d)***

### **Introduction**

The finalized amount of 2016 Community Development Block Grant (CDBG) funds for the Township of Parsippany-Troy Hills is \$193,838 with anticipated program income of \$. A total of four activities were granted funding as part of the 2015 CDBG Program.

#	Project Name
1	Senior Center Renovations
2	ADA Accessibility Improvements
3	Street Improvements
4	Housing Rehab
5	General Program Administration

**Table 8 – Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Funding awards are based on need and activity eligibility. Assistance is spread throughout the Township with actual locations determined by applications received and funding availability.

Obstacles to meeting underserved needs include:

- Limited funds for the CDBG programs
- Diminishment and disappearance of State funds
- Diminishment and disappearance of local funds
- Diminishment and disappearance of private funds
- Increased competition for diminishing pool of funds
- Lack of affordable child care services
- Lack of transportation
- Lack of employment training and opportunities
- Lack of affordable housing; severe shortage of affordable rentals
- Lack of employment training for veterans
- Lack of affordable permanent supportive housing for veterans
- Lack of land for construction of facilities and residential units
- Lack of societal 'will' to address the need of the underserved
- Dwindling capacity on the part of providers due to layoffs
- Severe financial stress on the part of non-profits

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Senior Center Renovations
	<b>Target Area</b>	Township-wide
	<b>Goals Supported</b>	Improve/expand public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$38,000
	<b>Description</b>	Replace a rooftop HVAC unit and overhaul the upstairs men's bathroom at the senior center on Knoll Road. Matric code 03A.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
2	<b>Project Name</b>	ADA Accessibility Improvements
	<b>Target Area</b>	Township-wide
	<b>Goals Supported</b>	Improve/expand public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$25,838
	<b>Description</b>	Installation of automatic doors at Town Hall and handicapped railings and sidewalk improvements at the Parsippany Library. Matrix code 03.

	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>3</b>	<b>Project Name</b>	Street Improvements
	<b>Target Area</b>	Township-wide
	<b>Goals Supported</b>	Improve/expand infrastructure
	<b>Needs Addressed</b>	Infrastructure
	<b>Funding</b>	CDBG: \$110,000
	<b>Description</b>	Road resurfacing for Paris Place, Doric Avenue, Kings Court, and Princess Street. Matrix code 03K.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	Housing Rehab
	<b>Target Area</b>	Township-wide
	<b>Goals Supported</b>	Create/preserve affordable housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$3,000

	<b>Description</b>	Elimination of code violations for low- and moderate-income owner-occupied households. Matrix code 14A.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
5	<b>Project Name</b>	General Program Administration
	<b>Target Area</b>	Township-wide
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Planning & Administration
	<b>Funding</b>	CDBG: \$20,000
	<b>Description</b>	On-going program administration and public outreach. Matrix code 21A.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	

***AP-50 Geographic Distribution - 91.420, 91.220(f)***

**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The Township does not set priorities for allocating investments geographically. The Township concentrates on low and moderate income areas as well as areas with the greatest needs. The Township executes a housing rehabilitation program for single family homes owned by low and moderate income persons on a first come first serve basis. The only possible exceptions to this rule would be cases of an emergent nature (ex.-collapsed roof, failed furnace in winter, etc.). The Township is also responsible for the implementation of public improvement and facilities projects that qualify per HUD approved guidelines.

**Geographic Distribution**

Target Area	Percentage of Funds
Township-wide	100

**Table 9 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

The Township does not set priorities for allocating investments geographically. The Township concentrates on low and moderate income areas as well as areas with the greatest needs.

## ***AP-85 Other Actions - 91.420, 91.220(k)***

### **Introduction**

Parsippany has developed the following actions planned to: address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based hazards, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public and private housing and social service agencies.

### **Actions planned to address obstacles to meeting underserved needs**

To address the obstacles identified in the five year plan, the Township will seek other funding and maximize the use of existing funding by coordinating efforts with the Morris County Department of Human Services, the Housing Alliance of Morris County, Fair Housing Committee, Foreclosure Taskforce, the county's Human Services Advisory Council, and the Continuum of Care.

### **Actions planned to foster and maintain affordable housing**

The Township has participated in the Morris County Consortium for the purposes of the HOME Program since 1994. The Township will continue to participate in this program so that these funds can be used to provide affordable housing opportunities that benefit low and moderate income persons. The Township also has several senior apartment complexes which provide for additional Section 8 low income affordable housing for seniors and the disabled. The Township will continue to monitor and work with the present management companies to insure affordable housing at our various senior complexes. In addition, the Township addresses the needs of persons with special needs on a case by case basis directly through the Township's Human Services Department. The Township completed twelve single family residential rehabilitations, bringing them up to code, which enabled low and moderate income residents to remain in their homes. Of the twelve completed units, five were very low income and two were extremely low income.

### **Actions planned to reduce lead-based paint hazards**

The Township addresses the lead-based paint issue as part of our housing rehabilitation program and will continue to enforce the lead-based paint regulations on a case by case basis.

### **Actions planned to reduce the number of poverty-level families**

CDBG, HOME, and ESG funding is integrated into the programs that address poverty and homelessness by participating agencies that are served by the Morris County Continuum of Care, the Fair Housing Committee of the Morris County Human Relations Commission, and the Housing Alliance of Morris County. These agencies, and others, provide much needed services to assist residents that are living in poverty. Further programs undertaken by the Township such as home rehabilitation and transportation assistance reduce the impact of poverty and provide for income growth for families living in poverty.

### **Actions planned to develop institutional structure**

The Township has participated with the County of Morris to address action steps to end chronic homelessness county-wide utilizing available federal funds such as ESG and SuperNOFA. The Township also worked with the County of Morris in developing a county-wide 10-year Homeless Plan and participates in updates of this plan.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The jurisdiction will carry out its annual plan through a network of partnerships with governmental and non-profit agencies. It reinforces these relationships through participation in regional efforts such as the Housing Alliance of Morris County and the Housing Committee of the Morris County Human Relations Commission. The Township will continue to provide coordination through the Human Services Department with both public and private housing along with various social service agencies.

# Program Specific Requirements

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## *AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)*

### Introduction

#### **Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### **Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%